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Admitted in VA and DC

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**DOCKET FILE COPY ORIGINAL**

Our File No.  
0090-100-63

August 22, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

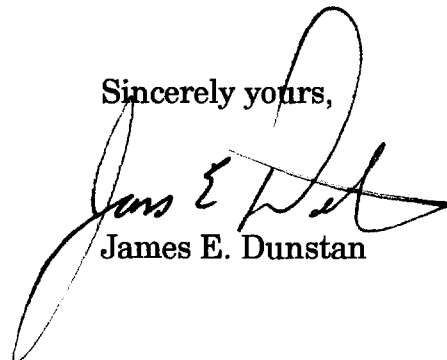
Re: Comments of Meredith Corporation  
MM Docket No. 87-268

Dear Mr. Caton:

On behalf of Meredith Corporation, I am transmitting an original and four (4) copies of its Comments of Meredith Corporation in the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268.

Please contact this office directly if there are any questions concerning this matter.

Sincerely yours,



James E. Dunstan

JED/cew  
Enclosures

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Before The  
Federal Communications Commission  
Washington, D.C. 20554

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AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast )  
Service )

To: The Commission

COMMENTS OF MEREDITH CORPORATION

Meredith Corporation ("Meredith"), by its attorneys, hereby files these Comments in the above-referenced proceeding in response to the various petitions for reconsideration filed in response to the Commission's *Fifth Report and Order* ("Fifth R&O") and *Sixth Report and Order* ("Sixth R&O") (adopted April 3, released April 21, 1997), in the above-referenced proceeding. In support of these Further Comments, Meredith submits:

I. INTRODUCTION

Throughout this proceeding Meredith has participated through the various MSTV filings, including its "Joint Petition For Clarification and Partial Reconsideration," filed June 13, 1997. By *Order*, DA 97-1377 (released July 2, 1997), the Commission extended the period for filing reply comments in the above-referenced proceeding until August 22, 1997, in order to allow all parties an opportunity to thoroughly review OET Bulletin No. 69, used to

determine the propagation of DTV facilities, as well as calculating both DTV-DTV interference, and DTV-NTSC interference cases.

## **II. THE COMMISSION'S DATABASE CONTAINS AN ERROR AS TO THE DIRECTIONALIZATION OF MEREDITH'S WOFL, CHANNEL 35, ORLANDO, FLORIDA**

In looking at the impact of digital operation for Meredith's Orlando station, WOFL, Channel 35 (NTSC) and Channel 22 (DTV), Meredith has discovered a dramatic error in the FCC's database - *somehow WOFL's directional array has been inverted so that the major lobe is now proposed to cover the Atlantic Ocean.*

Attached as Exhibit 1 hereto is a copy of the engineering map which accompanied Meredith's June, 1996, minor modification request to increase power at WOFL. It shows the currently licensed contours as well as the contours as proposed, using 5,000,000 watts ERP.<sup>1</sup> The contour's major lobes are at approximately 10, 130, and 250 degrees.

Attached as Exhibit 2 is the result of a study conducted by MSTV as part of its analysis. It is based on the database MSTV believes the Commission used in creating the Table of Allotments contained in the *Sixth R&O*. The database appears to have inverted the WOFL contour, placing the main lobes

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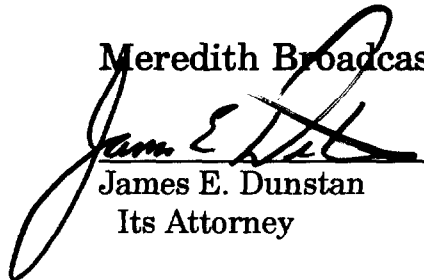
<sup>1</sup> Meredith continues urge the Commission to consider in the Table of Allotments all modification applications on file at the FCC prior to the release of the *Sixth Further Notice* (July 25, 1996), but not granted before release of the *Sixth R&O*. Meredith's modification application has been on file since June, 1996, but remains pending at this time. It is fundamentally unfair to protect applications that were filed after Meredith's, but granted before the release of the *Sixth R&O*, and not protect the facilities proposed by Meredith well over a year ago. See *Sixth R&O*, ¶ 113.

at approximately 60, 180, and 310 degrees. The net impact of this mistake is that the largest of the lobes now extends far into the Atlantic Ocean, and significant areas are lost from WOFL's service area.

Meredith continues to pursue an answer as to how this error "crept" into the system. Since the Commission has ruled that August 22, 1997, is the last opportunity stations have to file supplemental filings in this proceeding, however, Meredith is filing these Comments to place the FCC on notice of this apparent database error, and requests that it be remedied.

Respectfully Submitted,

Meredith Broadcasting Corp.

A handwritten signature in black ink, appearing to read "James E. Dunstan", is written over the printed name and title.

James E. Dunstan  
Its Attorney

Haley Bader & Potts P.L.C.  
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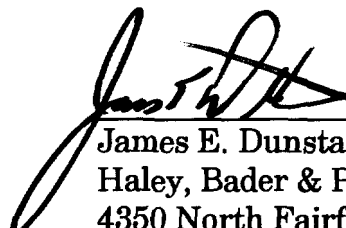
August 22, 1997

## **CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing "Comments of Meredith Corporation" has been delivered by first class mail to the following on this 22<sup>nd</sup> day of August, 1997, except as otherwise indicated.

Victor Tawil  
Senior Vice President  
Association for Maximum Service Television, Inc.  
1776 Massachusetts Avenue, N.W., Suite 310  
Washington, DC 20036

Jonathan D. Blake  
Ellen P. Goodman  
Victoria M. Huber  
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Washington, DC 20044-7566



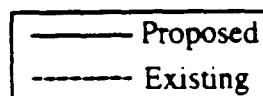
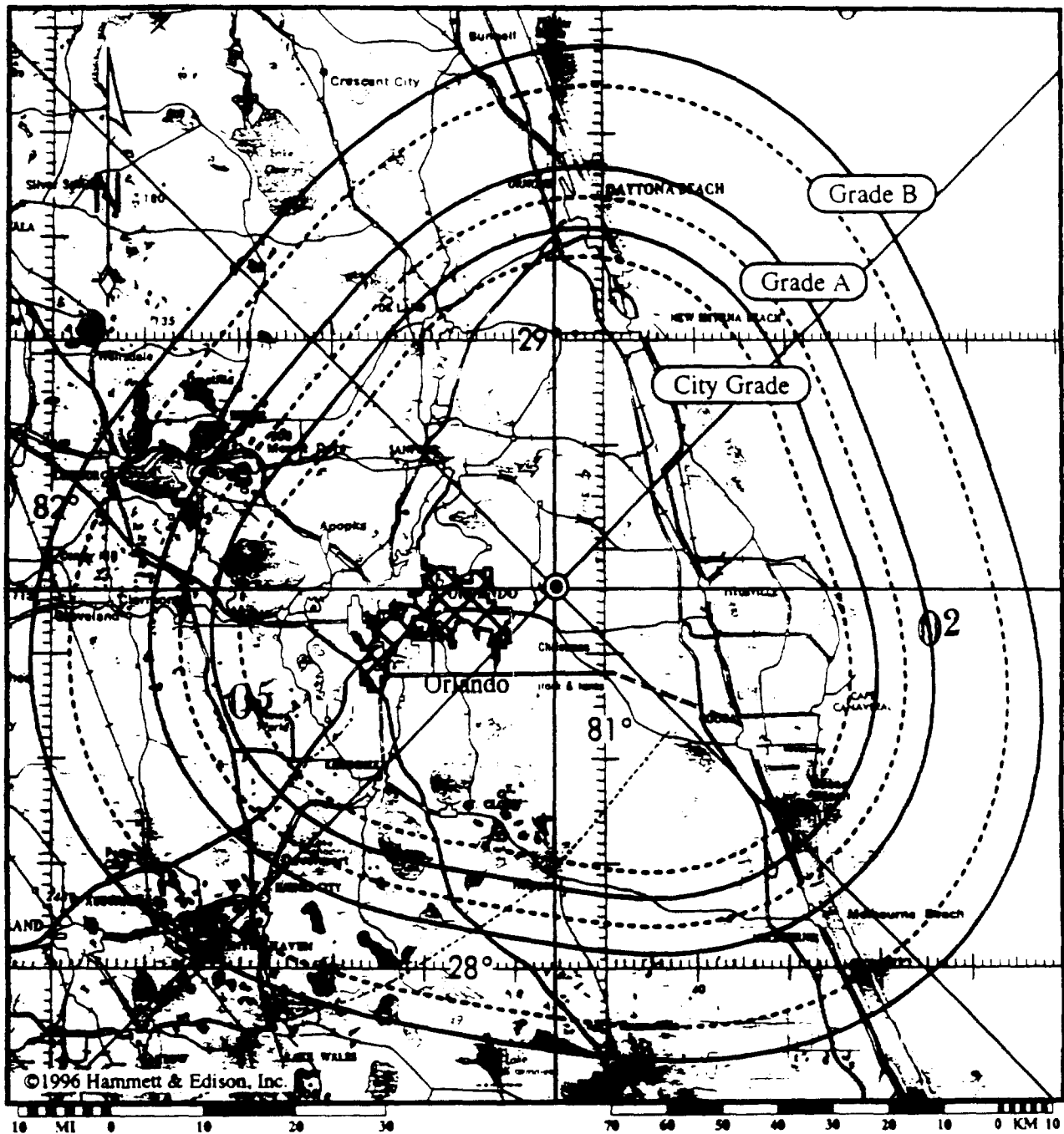
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# **EXHIBIT 1**

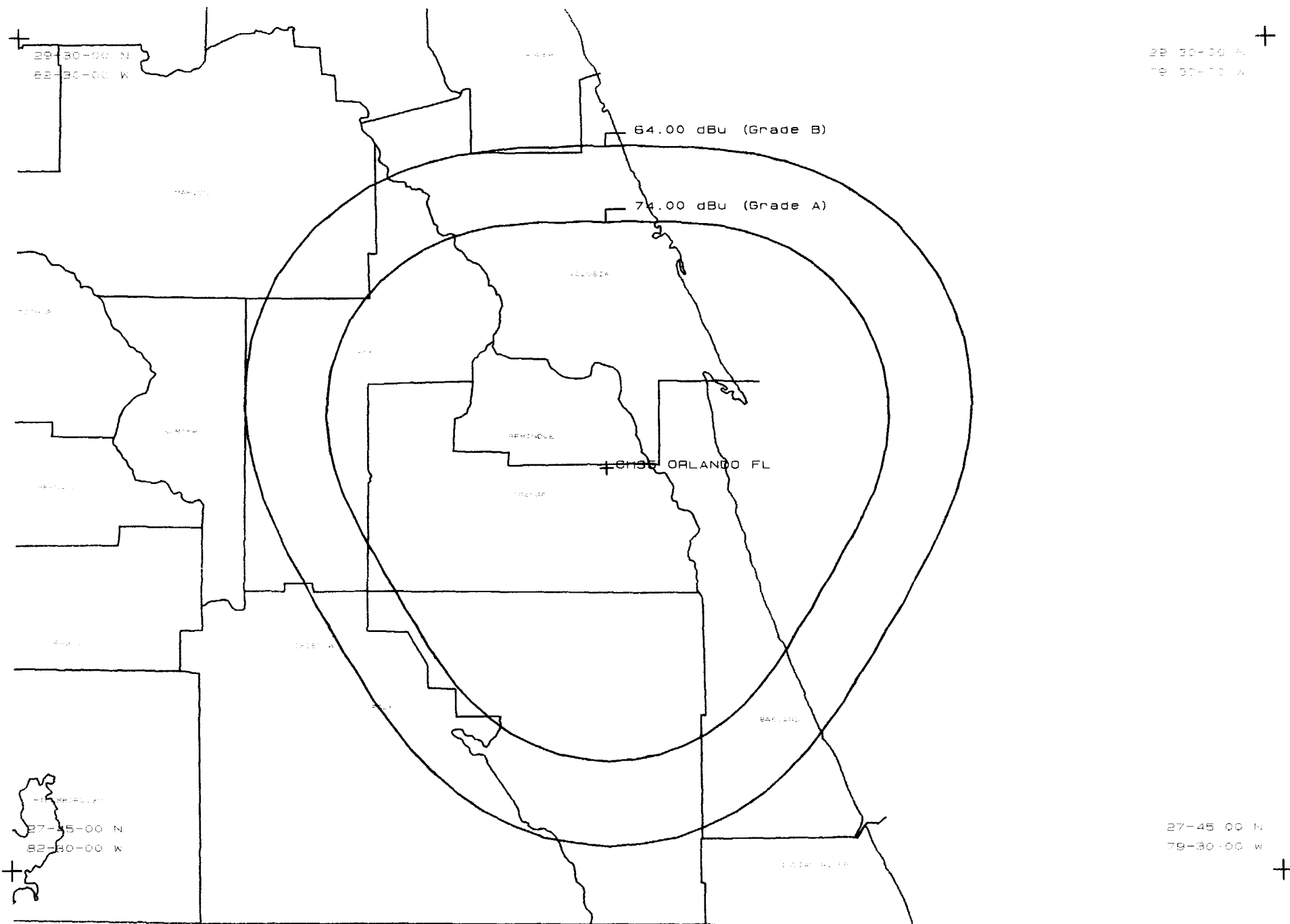
TV Station WOFL • Channel 35 • Orlando, Florida

Calculated Field Strength Contours



## **EXHIBIT 2**





Contours calculated using FCC Eng. Data Base  
 WOFL Ch. 35 ERP 2570.0 HAAT 451.0  
 ORLANDO FL Dir. Ant. DIE ODD950707KF  
 Date: 02 27 97

Scale points 28.60/ 51.09/ 107.34

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